

C L I F F O R D
C H A N C E

CLIFFORD CHANCE US LLP

31 WEST 52ND STREET
NEW YORK, NY 10019-6131

TEL +1 212 878 8000
FAX +1 212 878 8375

www.cliffordchance.com

BY ECF

Direct Dial: +1 212 878 8205
E-mail: jeff.butler@cliffordchance.com

The Honorable Paul A. Engelmayer
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

July 13, 2022

Re: *Frontier Airlines, Inc. v. AMCK Aviation Holdings Ireland Limited et al.,*
22 Civ. 2943 (PAE)

Your Honor:

We represent all nine Defendants in the above-referenced action. We are writing to request an extension of Defendants' time to answer or file a motion to dismiss.

Plaintiff filed the initial Complaint in this action on April 8, 2022 against six Defendants. These original Defendants previously requested an extension of time to respond to the Complaint to June 3, 2022, and an extension of time to respond to Plaintiff's anticipated Amended Complaint to July 22, 2022. The Court granted these applications by Orders dated May 4 and June 2, 2022.

Plaintiff filed an Amended Complaint on June 24, 2022. The Amended Complaint names three additional defendants and also asserts new claims against one of the original Defendants. Absent an extension of time, there would be different response dates for the original Defendants and the three new Defendants.

We respectfully request an extension of time to answer or move to dismiss the Amended Complaint to August 26, 2022 for all Defendants. Such an extension would give all Defendants time to consider the new claims and allegations, and also would allow all Defendants to respond at the same time. Plaintiff's counsel has consented to this requested extension.

Respectfully submitted,

s/Jeff E. Butler

Jeff E. Butler